UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re: AUTOMOTIVE PARTS ANTITRUST LITIGATION — Case No. 12-md-02311 — Honorable Marianne O. Battani

In re: ALTERNATORS — 2:13-cv-00701-MOB-MKM
STARTERS — 2:13-cv-01101-MOB-MKM
IGNITION COILS — 2:13-cv-01401-MOB-MKM
FUEL INJECTION SYSTEMS — 2:13-cv-02201-MOB-MKM

DIRECT PURCHASER ACTIONS

THIS RELATES TO:

ALL EUROPEAN AUTO SUPPLY, INC.,

Plaintiff,

vs.

DENSO CORPORATION, et al.,

Defendants.

2:15-cv-11827-MOB-MKM
2:15-cv-11828-MOB-MKM
2:15-cv-11830-MOB-MKM

THIS RELATES TO:

TIFFIN MOTOR HOMES, INC.

Plaintiff,

vs.

DENSO CORPORATION, et al.,

Defendants.

2:14-cv-10674-MOB-MKM

STIPULATION AND ORDER REGARDING
TIMELINE FOR RESPONDING TO COMPLAINTS

All European Auto Supply, Inc. and Tiffin Motor Homes, Inc. (collectively, "Plaintiffs") have filed the above-captioned actions ("Actions") against various Defendants, including

Hitachi, Ltd., Hitachi Automotive Systems, Ltd. and Hitachi Automotive Systems Americas, Inc. (collectively, "Stipulating Defendants"), alleging violations of Section 1 of the Sherman Act in connection with the sale of Alternators, Starters, Ignition Coils and Fuel Injection Systems. So as to preserve both party and judicial resources, Plaintiffs and Stipulating Defendants, by and through their undersigned counsel, stipulate to the following with respect to the Action:

1. It is stipulated by and between the undersigned parties, by their respective counsel, that Hitachi, Ltd. and Hitachi Automotive Systems, Ltd., in satisfaction of the requirements of Fed. R. Civ. P. 4, agree to waive service of the Complaints in the above-captioned Alternators and Fuel Injection Systems actions. Plaintiffs agree to mail complete and unredacted copies of the Complaints in English and Japanese to Hitachi, Ltd. and Hitachi Automotive Systems, Ltd. via Federal Express (or other global delivery service) to an address in Japan to be provided to Plaintiffs by counsel for Stipulating Defendants.

2. Unless otherwise modified by a case management order entered in the Actions, Stipulating Defendants shall, as permitted by Fed. R. Civ. P. 12, answer, move, or otherwise respond within 120 days after either: (a) service on Stipulating Defendants of complete and unredacted copies of an amended complaint in the respective Actions in English and Japanese or (b) service on Stipulating Defendants of complete and unredacted copies of the current Complaint in the respective Actions in English and Japanese together with written notice by Plaintiffs that they will not be filing an amended complaint in the Action.

3. Plaintiffs and Stipulating Defendants stipulate and agree that the entry into this stipulation by Stipulating Defendants shall not constitute a waiver of (a) any jurisdictional defenses that may be available under Rule 12 of the Federal Rules of Civil Procedure, (b) any affirmative defenses under Rule 8 of the Federal Rules of Civil Procedure or (c) any other

statutory or common law defenses that may be available to Stipulating Defendants in this or any other related actions. Stipulating Defendants expressly reserve their right to raise any such defenses (or any other defense) in response to (a) the current complaint or any amended and/or consolidated complaint that may be filed on behalf of Plaintiffs or any other Direct Purchaser, and/or (b) any complaint that may be filed in any related action.

IT IS SO STIPULATED.

Dated: March 8, 2016

Interim Co-Lead Counsel for Direct Purchaser Plaintiffs

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Dated: March 8, 2016

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IT IS SO ORDERED.

Date: April 21, 2016

s/Marianne O. Battani
MARIANNE O. BATTANI
United States District Judge